

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

CONVERGENT ASSETS LLC,

Plaintiff,

v.

SNAP INC.,

Defendant.

C.A. No. 6:23-cv-181-AM

JURY TRIAL DEMANDED

PATENT CASE

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT’S MOTION TO TRANSFER VENUE UNDER 28 U.S.C. §1404(a)**

Plaintiff Convergent Assets LLC (“Plaintiff” or “Convergent Assets”) files this unopposed motion seeking an extension of time to response to Defendant’s Motion to Transfer to Venue Under 28 U.S.C. §1404(a) (“Motion to Transfer”) (Doc. #9). Snap Inc. (“Defendant” or “Snap”) does not oppose venue discovery, subject to reserving all right to object to the discovery requests. Snap also does not oppose an extension for Plaintiff to respond to the Motion to Transfer until 14 days after Snap serves its objections and responses. In support of its motion, Plaintiff states as follows:

Convergent Assets filed its complaint for patent infringement on March 10, 2023. (Doc. #1). Defendant filed an answer and counterclaims and its Motion to Transfer on May 29, 2023. (Doc. #9). The response to the Motion to Transfer is currently due June 9, 2023. Upon review of the Motion to Transfer, Convergent Assets believes that venue discovery is necessary to respond to the Motion to Transfer.

Plaintiff sent proposed venue interrogatories and requests for production to Defendant seeking their agreement for early discovery limited to venue and an extension to respond to the Motion to Transfer until after Snap serves its objections and responses to the venue discovery. The

parties met and conferred. Defendant does not oppose early venue discovery of the proposed venue discovery requests (subject to their objections to individual requests) and does not oppose an extension for Plaintiff to respond to the Motion to Transfer to 14 days after Snap serves its objections and responses.

Convergent Assets served its venue discovery on June 7, 2023. Allowing 30 days for Snap to object and respond to the venue discovery, Convergent Assets seeks an extension to July 21, 2023.

CONCLUSION

For the foregoing reasons, Convergent Assets respectfully requests that the Court grant an extension to respond to the Motion to Transfer to July 21, 2023.

June 7, 2023

Respectfully Submitted,

/s/ David R. Bennett

David R. Bennett

(Admitted U.S. Dist. Ct. for the W.D. Texas)

Direction IP Law

P.O. Box 14184

Chicago, IL 60614-0184

(312) 291-1667

dbennett@directionip.com

Attorney for Plaintiff Convergent Assets LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on June 7, 2023, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ David R. Bennett

David R. Bennett